

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

| | | |
|------------------|---|-----------------------|
| CAMPUSEAI, INC., |) | |
| |) | CASE NO. 1:10 CV 2861 |
| Plaintiff, |) | |
| |) | |
| -vs.- |) | |
| |) | JUDGE LESLEY WELLS |
| DATATEL, INC., |) | |
| |) | |
| Defendant |) | |

**PLAINTIFF CAMPUSEAI, INC.'S NOTICE OF
DEPOSITION PURSUANT TO FED. R. CIV. P. 30(b)(6)**

Plaintiff CampusEAI Inc., pursuant to Federal R. Civ. P. 30(b)(6), gives notice that it will take the deposition of Defendant Datatel, Inc. ("Defendant") at the offices of Brouse McDowell, 600 Superior Avenue East, Suite 1600, Cleveland, Ohio 44114 on Monday, January 24, 2011 beginning at 10 a.m. The deposition will be taken pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure on the matters listed on Exhibit A to this deposition notice and may be continued from day to day until completed. The deposition will be recorded by stenographic means. Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Defendant is directed to designate one or more of its proper employees, officers, agents, or other persons duly authorized to testify on its behalf regarding all information known or available to it concerning the matters listed on Exhibit A hereto.

Respectfully submitted,

/s/ Joseph T. Dattilo

Joseph T. Dattilo (0010398)

Christopher J. Carney (0037597)

Michael P. O'Donnell (0078390)

BROUSE MCDOWELL

600 Superior Avenue East, Suite 1600

Cleveland, Ohio 44114

(216) 830-6830

(216) 830-6807 (fax)

jdattilo@brouse.com

ccarney@brouse.com

modonnell@brouse.com

Michael C. DeJohn (0077227)

1111 Superior Avenue, Suite 310

Cleveland, OH 44114

(216) 589-9626

(216) 589-9639

michael_dejohn@campuseai.org

Attorneys for Plaintiff

CampusEAI

Exhibit A

Defendant is requested to produce a designee or designees to testify regarding all facts reasonably related to the following subject matter:

1. Defendant's business practice and/or strategy of obtaining competitors' business information, and specifically CampusEAI's information, through public record requests, including, but not limited to, how the strategy was developed, by whom the strategy was developed, and for what purpose the strategy was developed.

2. What institutions of higher education, whether public or private, or other governmental entities, were contacted by Datatel to obtain third-party competitors', and specifically CampusEAI's, business information.

3. What information, documents, or other responses were received by Datatel as the result of the requests described in number 2 above.

4. What is or was the purpose of making public record requests to public entities to obtain business information about CampusEAI and other third-party competitors.

5. How Datatel intended or intends to use the information it requested and or obtained through its requests described in number 3 above.

6. What business records or information Datatel treats as confidential or proprietary business information or trade secrets.

7. The steps Datatel takes to ensure that its trade secret information maintains its status as trade secrets.

8. Datatel's internal decision making process on classifying and releasing confidential or proprietary business or trade secret information or documents.

9. The categories and types of information Datatel provides to institutions of higher learning whether pursuant to a request for proposal (“RFP”) or a direct bid.

10. Datatel’s internal RFP policies and procedures.

11. The confidentiality agreements or other agreements Datatel requires the institutions of higher learning to sign before providing those institutions with business records or information Datatel regards as confidential or proprietary business information or trade secrets.

12. Datatel’s organizational structure and or personnel as of November 29, 2010.

13. Datatel’s development and implementation of its portal within the last seven years.

14. Datatel’s development and implementation of its sales strategy within the last seven years.

15. Datatel’s development and implementation of its pricing strategy within the last seven years.

16. Datatel’s development and implementation of its marketing strategy within the last seven years.

17. Datatel’s development and implementation of its product development within the last seven years.

18. Datatel’s development and implementation of its product engineering within the last seven years.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's system.

/s/ Joseph T. Dattilo
Joseph T. Dattilo (0010398)

797711